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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT TACOMA

11 In Re:

12 DMCA SUBPOENA TO CLOUDFLARE,
13 INC.,

14 Service Provider.

Case No.:

DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA TO
CLOUDFLARE, INC.

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DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA
TO CLOUDFLARE, INC. - 1

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

1 I, Katsuhisa Aoyagi, hereby declare as follows:

2 1. I am the President of WILL Co. Ltd. (hereinafter, "WILL") and am authorized to
3 act on its behalf. I have personal knowledge of the facts contained herein and, if called upon to
4 do so, could and would testify competently thereto.

5 2. I submit this declaration in support of WILL's request for issuance of a Subpoena
6 by the Clerk of this Court, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17
7 U.S.C. § 512(h) to Cloudflare, Inc. ("Cloudflare"), relating to the posting of WILL's copyrighted
8 material on the domain, Share-Videos.se, a webpage hosted by Cloudflare.

9 3. I have personal knowledge of the copyrights owned by WILL and the ongoing
10 infringements of those copyrights that occur on the internet. I also have personal knowledge of
11 the countless instances that WILL's copyrighted works have been posted without WILL
12 authorization to Share-Videos.se.

13 4. On October 15, 2020, authorized agent for WILL Kenichi Yamaki issued and
14 served a copyright infringement notification on Cloudflare's DMCA Agent relating to posts on
15 Share-Videos.se. Pursuant to Section 512(c)(3)(A), the notification was properly signed by
16 WILL's agent, identified the copyrighted material being infringed, set forth a listing of the 12
17 URLs containing posts of infringing material, confirmed that such use of WILL's copyrighted
18 works was not authorized by WILL, and gave contact information such that the DMCA Agent
19 could reach him with questions. A true and correct copy of the October 15, 2020 notification is
20 attached as Exhibit A.

21 5. The purpose of the DMCA Subpoena is to obtain information sufficient to
22 identify alleged infringers who, without authorization from WILL, posted material to the
23 webpage Share-Videos.se, which infringed copyrights held by WILL. The information received
24 as a result of the Subpoena will only be used by WILL to protect its rights under Title 17 of the
25 United States Code.

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DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA
TO CLOUDFLARE, INC. - 2

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 DATED this 29th day of October, 2020, at Tokyo, Japan.
4

5 Katsuhisa Aoyagi
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7 KATSUHISA AOYAGI
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DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA
TO CLOUDFLARE, INC. - 3

FREEMAN LAW FIRM, INC.
1107 1/2 Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

Exhibit A

**Copies of Notifications Issued Pursuant to
17 U.S.C. § 512(c)(3) to
Registered DMCA Agent for
Service Provider Cloudflare, Inc.**



will.jp

Copyright Infringement Notice, Please React Ref ID:[HL5F88331F.EC728-2c7f-0f6c1] Contains 12 links

1 message

legal@[REDACTED]
To: abuse@cloudflare.com
Cc: legal@[REDACTED]

Thu, Oct 15, 2020 at 6:36 AM

Re: Infringing content hosted on your servers.
Number of Violations: 12
Ref: HL5F882F95,2A804-2c7f-0f6c1

Dear File Hosting Service,

The links attached below are infringing our content rights:

Owner: WILL Co., Ltd.
Address: Takehara Building 2F, 3-15-20 Roppongi, Minato-ku, Tokyo, 106-0032, Japan
Tel: +81-3-[REDACTED]
WebSite: <http://www.will-hp.jp/>
Email: [protect@\[REDACTED\]](mailto:protect@[REDACTED])

Please investigate the matter.

WILL Co., Ltd. and/or its affiliated companies (collectively "WILL") are the exclusive owners of copyrights or distribution rights in motion pictures ("WILL Property"). WILL swears under the penalty of perjury that we are the owner of the content and copyright listed below. Distribution of such content is only permitted through our official website or via an express written licensing agreement. Any other form or outlet of distribution of such content is illegal and constitutes copyright infringement. Original works owned by WILL can be seen at <https://www.dmm.co.jp/>.

The undersigned has a good faith belief that use of WILL Property in the manner described herein is not authorized by WILL or the law. The information in this notice is accurate. Under penalty of perjury, the undersigned is authorized to act on behalf of WILL with respect to this matter. Pursuant to this notification, you should immediately take steps to locate and remove and/or disable access to the infringing content that is on your system.

Please be advised that this letter is not and is not intended to be a complete statement of the facts or law as they may pertain to this matter or of WILL's positions, rights or remedies, legal or equitable, all of which are expressly reserved.

We appreciate your immediate attention to this important matter.

Sincerely,

Kenichi Yamaki
Legal Manager, WILL Co., Ltd.
Phone: +81-3-[REDACTED]
Email: [protect@\[REDACTED\]](mailto:protect@[REDACTED])

2020-10-15 13:16:37

<---Important Notice--->

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prevail over the electronic version.

<-----List of Links----->

Link: <http://share-videos.se/auto/video/61938397/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=miad963/>

Link: <https://embed.share-videos.se/auto/embed/65947579?uid=3772>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=mide430/>

Link: <http://share-videos.se/auto/video/55009049/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=miad963/>

Link: <http://share-videos.se/auto/video/47313231/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=wanz562/>

Link: <http://share-videos.se/auto/video/48275542/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=miad963/>

Link: <http://share-videos.se/auto/video/36774430/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=ssni117>

Link: <http://share-videos.se/auto/video/50773816/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=ssni117>

Link: <http://share-videos.se/auto/video/49086821/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=wanz562/>

Link: <http://share-videos.se/auto/video/49219950/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=wanz562/>

Link: <http://share-videos.se/auto/video/49376042/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=miad963/>

Link: <http://share-videos.se/auto/video/49408644/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=miad963/>

Link: <http://share-videos.se/auto/video/49412173/?uid=13>

URL: <http://www.dmm.co.jp/mono/dvd/-/detail/=cid=wanz562/>